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ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT, ALGERIAN BAR
US COURT ON INTERNATIONAL TRADE

September 29, 2021

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to Your Honor's September 27, 2020 Order [Doc. No. 7143] and Preconference Order, Defendants World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International (collectively referred to as "WAMY") submit the following list of its expert witnesses with a brief description of the subject of their testimony:

1. Marc Sageman, M.D., Ph.D., is an expert in the areas of terrorism, political violence, and the Middle East. Dr. Sageman offered affirmative and rebuttal testimony on the history and origins of Al Qaeda, Osama Bin Laden, and related terrorist organizations including their financing means and methods; the history and role of jihad and mujahideen in the Middle East; the Afghanistan war, and the Bosnian conflict. His opinions also covered the U.S. government's investigation of the funding of Al Qaeda and the 9/11 attacks; Plaintiffs' allegations against WAMY, WAMY's publications and statements by WAMY officials.
2. Jonathan T. Marks, CPA, CFF, CITP, CGMA, CFE, of Baker Tilly is a forensic accountant with expertise in auditing and accounting standards, money laundering and financial crimes. Mr. Marks offered rebuttal testimony on international accounting and auditing standards, the application of these standards to WAMY's financial practices and controls; and whether WAMY's financial practices, policies and operations raised any red flags for money laundering, terrorist financing or other criminal financial improprieties. He opined on the structure of WAMY's operations and its financial and operational documentation; WAMY's financial operations; comparative financial and accounting practices; and WAMY's internal controls over its financial operations.

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3. Khalid Blankinship, Ph.D., is an expert in Islamic Studies. Dr. Blankinship offered affirmative and rebuttal testimony on religion and politics in the Middle East, specifically in Saudi Arabia; Islamic views, comparative religion and the Saudi religious doctrine, Islamic principles and the Middle East culture; the concepts of terrorism, Jihad, Zakat, and other religious doctrines and words specific to Islam; a comparison of Wahhabism versus Islamic extremism, and rebuttal opinions contextualizing WAMY's publications and statements by WAMY officials.
4. Ambassador Chas W. Freeman, Jr. Ambassador Freeman is the former United States Ambassador to the Kingdom of Saudi Arabia (KSA) and an expert in the history, politics, and culture of Saudi Arabia. Ambassador Freeman offered affirmative and rebuttal testimony on colonialism and Wahhabism, various regional conflicts including the Bosnian war and Afghanistan, the relationship between the KSA and WAMY, and the history and relationship between the KSA and Osama Bin Laden.

Respectfully Submitted,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/Fredrick Goetz

Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)